

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
PAUL DAVIS,	)	
	)	
Plaintiff	)	
	)	Civil Action No. 04-11851-WGY
v.	)	
	)	
SUFFOLK COUNTY, AND	)	
ANDREA CABRAL (in her official	)	
capacity),	)	
	)	
Defendants	)	
_____	)	

**AFFIDAVIT OF EUGENE SUMPTER**

I, Eugene Sumpter, being duly sworn do hereby depose and state:

1. My name is Sumpter and I am the Superintendent of the Suffolk County Jail, which is located at 200 Nashua Street in Boston, Massachusetts.
2. I have been employed in different capacities at the Suffolk County Jail, including the former facility at Charles Street. More specifically I have worked as jail officer, a specialist (now called a corporal), a lieutenant, an Assistant Deputy Superintendent, a Deputy Superintendent, and Superintendent.
3. The Suffolk County Jail is a maximum-security facility that houses up to approximately 700 pre-trial detainees.
4. There are 13 detainee housing units in the jail, with each unit holding between 34 and 64 detainees.
5. In the 1998 – 1999 time period, there were in excess of 300 custody staff employed at the jail, ranging from jail officers, corporals, sergeants, lieutenant and captains.
6. In the 1998 – 1999 time period, housing units were generally staffed with two jail officers, and a supervisor, usually a sergeant, was assigned to a control center which connected two distinct housing units.

7. In the 1998 – 1999 time period, there were generally three SERT teams (two officers each) assigned to the 7 – 3 shift and three SERT teams (two officers each) assigned to the 3 – 11 shift.

Signed Under The Pains And Penalties Of Perjury This 13<sup>th</sup> Day Of September, 2005

/s/ Eugene Sumpter

Eugene Sumpter  
Superintendent